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Remarks

Claims 1-16 remain in the application. Claims 1, 3, 10, 12, 14, and 16 are hereby amended. No new matter is being added.

Claim Rejections -- 35 USC 103

Claims 1-4 and 7-16 were rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624 A1) in view of Bare (US 6,556,541 B1), hereinafter Bare (624) and Bare (541), respectively. Applicants respectfully traverse this rejection for the following reasons.

A first reason is based on the amended independent claims. For example, claim 1, as amended, now recites as follows.

1. A method of fault recovery by a switch in a local area network, the method comprising:

　　detecting a link failure at a port of the switch; and

　　clearing all medium access control (MAC) address entries from a MAC address table of the switch in response to the link failure detection and without receiving from outside the switch any signal that signifies that the MAC address table of the switch is to be cleared.

(Insertions indicated by underline.)

As seen above, amended claim 1 now clarifies that the step of "clearing all medium access control (MAC) address entries from a MAC address table of the switch in response to the link failure detection" is performed "**without receiving from outside the switch any signal that signifies that the MAC address table of the switch is to be cleared**." Applicants respectfully submit that, with this further limitation, claim 1 is neither taught nor suggested by any of the cited references.

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Applicants agree with the Examiner that Bare (624) does not disclose clearing all medium access control (MAC) address entries from a MAC address table of the switch in response to the link failure detection.

Applicants respectfully submit that claim 1 is now clearly distinguished over Bare (541). In particular, Bare (541) teaches that "a bit in the reserved portion of the protocol headers in cost packets is used in conjunction with the spanning tree protocol to signify that the receiving switch should flush its address tables after a brief timeout if no further packets are received from the address. In the preferred embodiment, this bit (also referred to as the STP flush flag) is set whenever the first cost packet is sent out as the mesh comes up (or restarts if all mesh ports were down and now one comes up) and the spanning tree protocol (STP) is enabled." (Column 42, lines 8-17, emphasis added.)

In other words, Bare (541) teaches that, upon a start-up or re-start, an STP flush flag is set in a cost packet sent to a mesh switch so as to indicate that the address tables of the switch are to be flushed. In contrast, the language of amended claim 1 now expressly recites that the step of "clearing all medium access control (MAC) address entries from a MAC address table of the switch in response to the link failure detection" is performed "**without receiving from outside the switch any signal that signifies that the MAC address table of the switch is to be cleared.**"

Therefore, applicants respectfully submit that claim 1, as hereby amended, now overcomes these rejections for at least the above-discussed reasons.

Claims 2-4 and 7-9 depend from claim 1. Hence, applicants respectfully submit that these claims now also overcome these rejections for at least the same reasons discussed above in relation to claim 1.

Claim 10 is amended with similar limitations as claim 1. Hence, applicants respectfully submit that claim 10 now overcomes these rejections for at least the same reasons discussed above in relation to claim 1.

Claims 11-13 depend from claim 10. Hence, applicants respectfully submit that these claims now also overcome these rejections for at least the same reasons discussed above in relation to claim 10.

Claim 14 is also amended with similar limitations as claim 1. Hence, applicants respectfully submit that claim 14 now overcomes these rejections for at least the same reasons discussed above in relation to claim 1.

Claims 15-16 depend from claim 14. Hence, applicants respectfully submit that these claims now also overcome these rejections for at least the same reasons discussed above in relation to claim 14.

A second reason is in regards to the rejection of claims 3, 12, and 16. Applicants respectfully disagree that paragraph 359 of Bare (624) discloses momentarily dropping a link on another port of the switch. On the contrary, paragraph 359 of Bare (624) discloses, "When the switch ID (MAC address) is set to 0xFFFFFFFFFFFF, then all broadcast paths to and from the port are removed." Hence, paragraph 359 of Bare (624) relates to removing broadcast paths from a port. Nowhere does Paragraph 359 of Bare (624) mention or suggest **momentarily dropping a link on another port of the switch**. To further clarify the meaning of momemtarily dropping a link, applicants have amended claims 3, 12 and 16 to specify that **momentarily dropping a link comprises stopping transmission of a link signal for a period of time.**

A third reason is in regards to the rejection of claim 4. Applicants respectfully disagree that paragraph 379 of Bare (624) discloses that momentarily dropping a link on another port of the switch causes propagation of the link failure to the next switch. On the contrary, paragraph 379 of Bare (624) discloses, "When an edge switch receives a packet from a new source ...., it will generate a switch MAC address information packet and send it out all load balance domain links ...." Hence, paragraph 379 of Bare (624) relates an address information packet relating to a new source. Nowhere does Paragraph 359 of Bare (624) mention or suggest that **momentarily dropping a link on another port of the switch causes propagation of the link failure to the next switch.**

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A fourth reason is in regards to the rejection of claim 7. Applicants respectfully disagree that paragraph 205 and table 5 of Bare (624) disclose momentarily dropping the link for a length of time sufficient for a next switch to detect the link drop. On the contrary, paragraph 205 and table 5 of Bare (624) discloses an update timer. Nowhere does paragraph 205 and table 5 of Bare (624) mention or suggest that **momentarily dropping the link for a length of time sufficient for a next switch to detect the link drop.**

A fifth reason is in regards to the rejection of claims 8 and 9. Applicants respectfully submit that there is no teaching in either Bare (624) or Bare (541) of **momentarily dropping the link for a length of time sufficient for a next switch to detect the link drop.** Hence, there is no relevant time period to be modified in those references.

Claim 5 was rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624 A1) in view of Bare (US 6,556,541 B1) and further in view of Eisen et al. Applicants respectfully traverse this rejection.

The rejection refers to "event 12 in figure 7" of Bare (624). Applicants respectfully submit that figure 7 does not show any such events. Applicants respectfully submit that the Examiner appears to have meant to refer to table 7 of Bare (624).

Applicants respectfully submit that event 7 in table 7 relates to a "Broadcast Delete Packet." Applicants respectfully submit that the Broadcast Delete Packet of Bare (624) does not disclose or suggest clearing a MAC address table. Hence, the combination of references does not disclose or suggest claim 5.

Claim 6 was rejected under 35 USC 103 as being unpatentable over Bare (US 2003/0016624 A1) in view of Bare (US 6,556,541 B1) and further in view of Tanoue. Applicants respectfully traverse this rejection.

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Applicants respectfully submit that Bare (624) and Bare (541) do <u>not</u> disclose or suggest clearing a MAC address table. Hence, the combination of references does <u>not</u> disclose or suggest claim 6.

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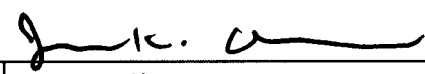Atty. Docket No. 10030.000210 (GCI-002)

Conclusion

For the above-discussed reasons, applicants respectfully submit that the application, as hereby amended, now overcomes all the objections and rejections from the office action. Favorable action is respectfully solicited.

If for any reason an insufficient fee has been paid, the Commissioner is hereby authorized to charge the insufficiency to Deposit Account No. 50-2427 of Okamoto & Benedicto LLP.

Respectfully Submitted,

Dated: October 19, 2007

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